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May 26th, 2025

Hon. Gregory H. Woods
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMORANDUM ENDORSED

Re: Tatintsian v. Vorotyntsev, Case No. 1:16-cv-7203

Dear Judge Woods:

I write this follow-up letter to inform the Court that due to the extremely late hour at which I was working last night, I failed to attach the preliminary deposition designations for both GT and DK cases, as well as the updated preliminary witness list and the complete exhibit list.

Given that today is Memorial Day and these materials will not be docketed until at least tomorrow, I am resending the preliminary versions of all required documents and respectfully ask the Court to allow amendments to the final versions over the next few days, as I complete my preparation.

I feel compelled to inform Your Honor that I have not had proper sleep in over a week, as I work diligently to meet the Court's deadlines under extraordinarily challenging circumstances. The combination of extreme sleep deprivation and the enormous emotional and psychological torture of having to re-live the devastating trauma, induced upon all our investors, and us has made for an almost unbearable conditions, in which I have to prepare to defend My Honor and the wellbeing of my family and investors.

I anticipate submitting finalized exhibit and witness lists, along with all required deposition designations over the next few days.

Additionally, there is such a substantial amount of material to unpack in these depositions, including evidence of admissions and confessions by both counter-defendants, in what I believe constitutes the most brazen attack on the sanctity of Your Honors Court that I am very concerned about making these deposition designations public at this time, pending the Court's review of the evidence and a decision of whether these records should be sealed from the public, at least until the Court has had a chance to make an informed decisions, as to the truthfulness and quality of representations made by the opposing counsel and the procedural fairness of these proceedings.

I hereby reserve all rights, including without limitation, to:

1. Finalize all exhibits and trial materials in a manner that adequately presents my defense;
2. Seek appropriate relief regarding the admission of evidence from the Khmaladze matter that is directly relevant to this case;
3. Bring amended claims against all current and additional counter-parties, the opposing lawyers, as well as those who have breached their contractual and professional obligations while representing ShopLink and myself.

I look forward to discussing these matters in detail, at such time as the Court deems appropriate.

I truly appreciate Your Honor's consideration of my requests.

Respectfully submitted,

s/Mikhail Vorotyntsev

Mikhail Vorotyntsev


Pro Se

cc: All counsel of record

Application denied. The Court set hard deadlines for Mr. Vorotyntsev to submit the required pretrial materials and has extended those deadlines multiple times upon request in light of his status as a *pro se* litigant. However, Mr. Vorotyntsev is expected to comply with the deadlines set by the Court. Mr. Vorotyntsev cannot reserve the right to continue to amend his witness and exhibit list ahead of trial. This case has proceeded for nine years. The parties have had seven months to prepare their pretrial materials. Mr. Vorotyntsev has been granted four extensions of the deadline to file the submissions as ordered by the Court. Therefore, Mr. Vorotyntsev is ORDERED to submit a complete and finalized witness list that names every individual he expects to call to testify at trial no later than May 31, 2025 at 5:00 p.m. Simply listing "Shoplink Investors" will not do; Mr. Vorotyntsev must name each person whom he expects to call to testify. Any person who is not individually named on his list by May 31, 2025 will not be allowed to testify at trial. This has been made clear to Mr. Vorotyntsev on multiple occasions; the Court expects his compliance.

SO ORDERED.

Dated: May 30, 2025
New York, New York


GREGORY H. WOODS
United States District Judge